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March 13, 2019

Via ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: WC Order No. 10-90, WT Order No. 11-40, WT Order No. 18-120, and WC
Docket No. 11-10.**

Dear Ms. Dortch:

On March 11, 2019, representatives of the National Tribal Telecommunications Association (NTTA), including Godfrey Enjady and Alan Morel with Mescalero Apache Telecom, Mona Thompson with Cheyenne River Sioux Tribe Telephone Authority, Beverly Lewis with Tohono O'odham Utility Authority, Belinda Nelson, John Lewis, Contra Nelson and Jim Meyers with Gila River Telecommunications, Greg Guice with McGuire Woods for Gila River Telecommunications, Bill Bryant and Dawn Sinoqui with Saddleback Communications, Harold Johnston with the Sovereign Council of Hawaiian Homestead Associations, Doug Kitch with Alexicon and the undersigned met with Chairman Ajit Pai and Special Counsel Preston Wise, Chief of Staff Travis Litman with Commissioner Jessica Rosenworcel's office, Commissioner Brendan Carr and Legal Adviser Will Adams, Commissioner Geoffrey Starks and Legal Adviser Randy Clarke, Matthew Duchesne, Sayuri Rajapaske, Janet Sievert and Susan Mort of the Office of Native Affairs and Policy, and Barbara Esbin of the Consumer Protection Bureau.

The group discussed its recent filing regarding the enhancement of the Universal Service Fund for Tribal legacy support mechanisms. In the Commission's December 2018 Rate-of-Return carrier budget order, positive steps were taken to increase the overall budget for small carrier universal support programs. In total, the Commission added a significant amount of new support to the overall budget, which will allow carriers, including NTTA members, to better plan for the upgrading, operations and maintenance of broadband networks in rural, Tribal areas. While the Commission did adopt a Tribal Broadband Factor (TBF) in relation to new offers of cost model-based support, nothing was adopted for those carriers remaining subject to legacy support mechanisms. It is vital that the Commission act on legacy support mechanism TBF support quickly in order to give carriers serving Tribal lands the best opportunity possible to close the digital divide that exists between rural Tribal areas and the rest of the country.

In addition, the NTTA representatives emphasized comments filed in the Commission's Transforming the 2.5 GHz Band proceeding, noting its support for a Tribal nation priority filing window and its call to make the Tribal window the first window the Commission opens. They stated that this should only be a small part of a solution to address broadband access on Tribal lands. Issues surrounding 5G deployment were also discussed.

The group discussed the importance of the Tribal Lifeline program and the need to ensure the National Verifier process does not hinder enrolling people residing on Tribal lands. The NTTA members spoke of complications they are having with the verification process and the need to work with the Commission to address those issues. Additionally, they called on the Commission to reinstate the School Lunch Program as one of the programs for determining eligibility.

The NTTA representatives also discussed broadband mapping, operational expense relief, and infrastructure enhancement.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Sincerely,

/s/ Randy Tyree

Randy Tyree

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